



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

July 25, 2023

**BY ECF**

The Honorable Lorna G. Schofield  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: United States v. Whitehead, 22 Cr. 692 (LGS)**

Dear Judge Schofield:

The parties respectfully submit the following proposed dates for the filing of any motions *in limine*:

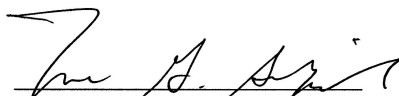
- Motions *in limine* shall be filed by January 12, 2024;
- Oppositions shall be filed by January 26, 2024; and
- Replies shall be filed by February 7, 2024.

The parties also propose a filing date of February 13, 2024, for joint proposed requests to charge, *voir dire*, and verdict sheets. In addition, the parties respectfully advise the Court as to the following:

- The Government plans to disclose 3500 and *Giglio* materials beginning on February 13, 2024, and on a rolling basis;
- The defense will disclose 26.2 materials on February 23, 2024, and on a rolling basis; and
- The defense will disclose defense exhibits to the Government on February 23, 2024.

Application Granted in part. Any motions *in limine* shall be filed by **January 12, 2024**, and any opposition shall be filed by **January 26, 2024**. No reply shall be filed. By **February 13, 2024**, the parties shall file a joint statement as provided in the Court's Individual Rule I.1., a joint proposed *voir dire*, joint proposed requests to charge, and a joint proposed verdict sheet, in each case noting any disagreements between the parties.

Dated: July 31, 2023  
New York, New York

  
LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

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